

## Koch, Kristine

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**From:** James McKenna <jim.mckenna@verdantllc.com>  
**Sent:** Friday, October 09, 2015 2:15 PM  
**To:** Grandinetti, Cami; Koch, Kristine  
**Cc:** Bob Wyatt (rjw@nwnatural.com); Jennifer Woronets (jworonets@anchorqea.com); Gustavson, Karl ERD-MS (Karl.E.Gustavson@usace.army.mil); Hayter, Earl J ERDC-RDE-EL-MS; Sheldrake, Sean; Cora, Lori  
**Subject:** RE: Portland Harbor - Contaminant Transport Model

Cami,

In response to your request the LWG believes it is most important that we discuss with your team the following topics prior to the NRRB meeting, and preferably before our respective reports are due to the NRRB (i.e., October 19):

- PTW designation
- Technology assignments
- Qualitative Evaluation of Alternatives
- Inclusion of riverbanks
- Residual risk

We also understand from our conversations with you and from EPA's presentation to the allocation group that EPA is continuing to revise its FS materials, and we request that EPA provide the revised materials and supporting information as soon as possible so that we can understand the basis for EPA's imminent selection of a remedy for Portland Harbor. In order to make these discussions as productive as possible we respectfully request your team provide any technical memoranda, communications or other documents related to these topics to us a few days before we meet.

That said, we want to emphasize that the unavailability of all of the information we have requested is a big problem for the LWG and its members. We need the information we have requested, and would appreciate an estimate of when it will be provided.

Without the information, we are prevented from understanding and checking the work that EPA has done, and we are limited in our ability to provide meaningful comments on the Draft FS. We would be happy to submit a FOIA request if that would provide EPA with additional resources to compile the information.

We can continue other technical discussions related to EPA's draft FS after the November NRRB meeting, but to do so we will still need the information we requested in our September 8, 2015, letter.

Thanks, Jim.

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**From:** Grandinetti, Cami [mailto:[Grandinetti.Cami@epa.gov](mailto:Grandinetti.Cami@epa.gov)]  
**Sent:** Wednesday, September 30, 2015 3:55 PM  
**To:** James McKenna ; Koch, Kristine  
**Cc:** Bob Wyatt (rjw@nwnatural.com) ; Jennifer Woronets (jworonets@anchorqea.com) ; Gustavson, Karl ERD-MS (Karl.E.Gustavson@usace.army.mil) ; Hayter, Earl J ERDC-RDE-EL-MS ; Sheldrake, Sean ; Cora, Lori  
**Subject:** RE: Portland Harbor - Contaminant Transport Model

Hi Jim, Thank you for taking a crack at narrowing your list. With respect to timing—it isn't a problem for us whether we work on your most significant issues now or after the National Remedy Review Board meeting. I'm hearing very strongly that your senior managers would like to work with us prior to the National Remedy Review Board meeting, presumably on issues of most concern. Therefore, I have asked for you to try to narrow your list so that we spend this time before

NRRB on what is most important to you. With that in mind, I'd ask that you consider further whether you need (as requested in your "Information Needs" paper) all "technical memoranda, communications and other documents" for each of the items you've flagged. Gathering all of that now just takes time away from us working on issues. Thanks for your consideration.

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**From:** James McKenna [<mailto:jim.mckenna@verdantllc.com>]  
**Sent:** Thursday, September 24, 2015 1:23 PM  
**To:** Koch, Kristine <[Koch.Kristine@epa.gov](mailto:Koch.Kristine@epa.gov)>  
**Cc:** Bob Wyatt ([rjw@nwnatural.com](mailto:rjw@nwnatural.com)) <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>; Jennifer Woronets ([jworonets@anchorqea.com](mailto:jworonets@anchorqea.com)) <[jworonets@anchorqea.com](mailto:jworonets@anchorqea.com)>; Gustavson, Karl ERD-MS ([Karl.E.Gustavson@usace.army.mil](mailto:Karl.E.Gustavson@usace.army.mil)) <[Karl.E.Gustavson@usace.army.mil](mailto:Karl.E.Gustavson@usace.army.mil)>; Hayter, Earl J ERDC-RDE-EL-MS <[Earl.J.Hayter@erdc.dren.mil](mailto:Earl.J.Hayter@erdc.dren.mil)>; Sheldrake, Sean <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>; Cora, Lori <[Cora.Lori@epa.gov](mailto:Cora.Lori@epa.gov)>; Grandinetti, Cami <[Grandinetti.Cami@epa.gov](mailto:Grandinetti.Cami@epa.gov)>  
**Subject:** RE: Portland Harbor - Contaminant Transport Model

Kristine,

The LWG is working diligently to meet the deadline set by EPA on August 18 for us to provide our full set of comments on EPA's Draft FS by October 9. We are also trying to meet EPA's request, issued last Friday, September 18, that the LWG provide comprehensive technical comments on "any technical issues pertinent to the cleanup decision, including the rationale and any recommended approach for site cleanup".

All of the information we requested on September 8 is critical to meeting EPA's requests, and until we see the various pieces we will not know which carries the greatest weight. Also, without all of the information, it is unlikely the LWG will be able to provide a comprehensive review of EPA's Draft FS, especially considering the limited time available before our comments are due. This is a significant problem for the LWG and for the other parties interested in EPA's work. We would ask, again, that you expedite this information to us so that we can meet your requests.

That being said, if EPA is limited in time and resources to generate the full package of information then we respectfully suggest you prioritize providing the following (the numbers correspond to our September 8 memo):

Information Needs to Enable Review of EPA's Revised FS Sections 3 and 4  
#8 (PTW assignments)  
#11 {RCRA Hazardous Waste}  
#17 (Dioxin/Furan RALs)  
#18 (PeCDD RALs)  
#19 (TPAH RALs)  
#20 (Benthic risk "toxicity points")  
#22 (Riverbanks)  
#28 (Construction duration assumptions)  
#32 (Residual risk)  
#38 (Areas and volumes associated with technology assignments)

#39 (Cost estimates per SMA or SDU)

Request for Corrected Information

#5 (information related to areas downstream of RM 1.9)

Please contact me to discuss potential efficiencies in providing the above information in batches or if you have any questions.

Thanks,  
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**From:** Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]

**Sent:** Thursday, September 17, 2015 11:09 AM

**To:** James McKenna <[jim.mckenna@verdantllc.com](mailto:jim.mckenna@verdantllc.com)>

**Cc:** Bob Wyatt ([rjw@nwnatural.com](mailto:rjw@nwnatural.com)) <[rjw@nwnatural.com](mailto:rjw@nwnatural.com)>; Jennifer Woronets ([jworonets@anchorqea.com](mailto:jworonets@anchorqea.com)) <[jworonets@anchorqea.com](mailto:jworonets@anchorqea.com)>; Gustavson, Karl ERD-MS ([Karl.E.Gustavson@usace.army.mil](mailto:Karl.E.Gustavson@usace.army.mil)) <[Karl.E.Gustavson@usace.army.mil](mailto:Karl.E.Gustavson@usace.army.mil)>; Hayter, Earl J ERDC-RDE-EL-MS <[Earl.J.Hayter@erdc.dren.mil](mailto:Earl.J.Hayter@erdc.dren.mil)>; Sheldrake, Sean <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>; Cora, Lori <[Cora.Lori@epa.gov](mailto:Cora.Lori@epa.gov)>; Grandinetti, Cami <[Grandinetti.Cami@epa.gov](mailto:Grandinetti.Cami@epa.gov)>

**Subject:** RE: Portland Harbor - Contaminant Transport Model

Due to the voluminous amount of information requested, it will take us quite some time to pull together. If you want to narrow the scope of the information you are requesting, we can focus on that information and provide it to you first.

Kristine Koch  
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**From:** James McKenna [<mailto:jim.mckenna@verdantllc.com>]

**Sent:** Thursday, September 17, 2015 11:01 AM

**To:** Koch, Kristine

**Cc:** Bob Wyatt ([rjw@nwnatural.com](mailto:rjw@nwnatural.com)); Jennifer Woronets ([jworonets@anchorqea.com](mailto:jworonets@anchorqea.com)); Gustavson, Karl ERD-MS ([Karl.E.Gustavson@usace.army.mil](mailto:Karl.E.Gustavson@usace.army.mil)); Hayter, Earl J ERDC-RDE-EL-MS; Sheldrake, Sean; Cora, Lori; Grandinetti, Cami  
**Subject:** Re: Portland Harbor - Contaminant Transport Model

Kristine, we will check with our team and get back to you as soon as practicable. On a related note, can you provide a status of our September 8th information request? Thanks , Jim.

Sent from my iPhone

On Sep 17, 2015, at 9:26 AM, Koch, Kristine <[Koch.Kristine@epa.gov](mailto:Koch.Kristine@epa.gov)> wrote:

Jim and Bob – I believe that we already have the code and input files for the sedimentation and transport model, but we do not have the code and input files for the contaminant transport model. Please let me know when you can send them to me.

Thanks,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

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